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US EPA RECORDS CENTER REGION 5
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Heidi Valetkevitch
Community Relations Coordinator
Office of Public Affairs (P-19J)
US EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

VIA FACSIMILE AND EXPRESS DELIVERY

RE: Public Comments on the Proposal Plan, Albion-Sheridan Township Landfill Superfund Site, Albion, Michigan
ASLA1T.001

Dear Ms. Valetkevitch:

Hull & Associates, Inc. (HAI) has been retained by Varnum, Riddering, Schmidt & Howlett, on behalf of the City of Albion, to prepare public comments pertaining to the Proposed Remedial Action Plan (PRAP) for the Albion-Sheridan Township Landfill Superfund Site (Site), prior to drafting and issuance of the Record of Decision (ROD). These comments, which are hereby submitted on behalf of the City of Albion were prepared based on HAI's understanding of the site as obtained by the review of the Final Remedial Investigation (RI), Final Presumptive Feasibility Study (FS), Final Presumptive Remedial Risk Assessment (RRA), the Preliminary Ecological Risk Assessment, and appropriate Michigan and federal solid waste landfill regulations.

In general, the PRAP includes:

1. The removal, characterization, and disposal of any drum or container encountered during regrading or construction activities associated with the closure of the site (Alternative #2A);

2. Construction and installation of a composite flexible membrane cap (FMC) system (Alternative #3A);

3. Installation and operation of an active gas control system (Alternative #4B); and

4. Implementation of a ground water monitoring network to evaluate the geochemical characteristics of the ground water proximate to the site (Alternative #5B).

HAI generally concurs with the approach presented in the PRAP for the Site. However, our recommendations and comments with regard to each of the proposed alternatives are as follows:

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Alternative 2A - Removal and Disposal of Encountered Drums or Containers

HAI agrees with this Remedial Action Alternative. We recommend the ROD incorporate language which could provide the flexibility to limit removal to only drums that are structurally sound and determined to contain hazardous waste in order to minimize transport/disposal costs and reduce exposure risks during closure. Criteria for determining which drums stay and which are to be removed should be incorporated into the ROD to minimize "room for interpretation" by regulatory personnel or the Remedial Action (RA) contractor.

Alternative 3C - Composite FML Cap System

HAI concurs this is probably the most cost effective approach to minimizing further infiltration and providing containment/isolation of existing waste(s), since suitable clay cap materials do not appear to be available in sufficient quantity within the immediate geographic area. In general, we recommend as follows:

- The ROD should provide for recontouring of the cap to minimize the need to cut and fill.

- The ROD should provide the use of inert material(s) as grading materials to achieve minimum sub-cap contours.

- Specific references to the proposed landfill cap contours shown in Figure 3.2 should not be included in the ROD. Alternate language, which allows the RD contractor to concurrently evaluate such things as soil balance requirements, surface water considerations, constructability, landfill settlement, landfill gas management, and minimum slopes, to optimize a final cap grade should be considered. In addition, it may be possible to allow inert material to be used as general fill to achieve pre-cap contours.

- The cap configuration as shown on Figure 3.3 of the FS should not be adopted as shown. A permeable drainage layer (presumably the intent of the sand layer) immediately above the flexible membrane cap (FMC) may be more effective. Provisions should be incorporated into the ROD to allow for performance demonstrations that alternate material for a drainage layer (i.e., geocomposite) can be considered.

HAI also notes that, according to industry sources, very low density polyethylene (VLDPE) may be unavailable for use as a flexible membrane cap.

Alternative 4A - Active Gas Control System

With regard to Alternative 4A, our comments are as follows:

- An active gas control system may not be warranted because the Risk Assessment does not address exposure to landfill gases nor does the RI/FS contain any data to support the need for an active system

- The ROD should include language which allows for site-specific demonstration(s) to justify the need for an active or passive system, and an active system should not be required unless the need is so justified.

- Federal regulations (New Source Performance Standards) may allow landfills to demonstrate that a passive system will meet Clean Air Standards (EPA Model).

- A gas vent constructed as shown on Figure 3.10 may be susceptible to settlement and direct precipitation infiltration. A larger size may also be more appropriate if conversion to an active system is ever considered and provisions for alternate anchoring or sealing mechanisms (versus concrete as shown) should be included in the ROD.

In summary, since no data has been collected to characterize the quality and quantity of landfill gas which may be generated in a post-closure condition, arbitrary incorporation of an active gas system into the ROD is presumptive and the ROD language should allow greater flexibility in meeting ARAR's. From a design standpoint, an active extraction system is known to exacerbate landfill settlement, which ultimately may result in increased cap maintenance costs. In addition, since a gas monitoring plan will have to be developed for the site pursuant to Act 641, it will be possible to include provisions to monitor the effectiveness of a passive venting system also.

Alternative 5B - Ground Water Monitoring Network Plan

Based on the data, HAI agrees with this Remedial Alternative as the concentration and extent of the ground water contamination does not appear to warrant the implementation of an active ground water remedy, nor present a significant risk to human health and the environment. Review of the FS indicates the objective of this alternative is to monitor and evaluate if the landfill cap system is effectively changing reduction/oxidation potential of the ground water system and allowing the dissolved arsenic constituent to precipitate into an insoluble state. Specifically, to meet this objective, monitoring wells inside and immediately adjacent to the areas of apparent contamination should be monitored and statistically evaluated. We request that the USEPA provide the rationale for such an extensive ground water monitoring program (especially the quarterly monitoring of residential wells) in light of the objective defined in the FS.

The ground water flow conditions of the bedrock aquifer documented in the RI indicate that nearby residential wells apparently receive water from the northwest (presumably the wells are set into the bedrock) and, thereby, to a large degree, are hydraulically isolated from the landfill. The monitoring of these residential wells should only occur as a contingency based on ground water quality results of wells affected by the landfill, rather than a pre-determined, arbitrary quarterly schedule.

Finally, the ROD should include language which allows the proposed ground water monitoring network to be amended by piezometric data collected from the installation of the two proposed monitoring well nests (PMW-15 and PMW-16). In addition, although it is not specifically stated, it is assumed that ground water samples will be collected and analyzed for only inorganic parameters as no volatile organic compounds which could be directly attributed to the landfill were detected during RI sampling events. A semi-annual VOC sampling frequency is more appropriate given the results of the risk assessment (arsenic is the contaminant of concern) and the requirements of Act 641 for post-closure monitoring.

Nothing in this letter is intended to be nor should it be construed as any admission of liability, responsibility, facts, or law. The City of Albion reserves all claims and defenses in this matter as to the U.S. EPA, Michigan Department of Natural Resources, and third-parties.

On behalf of the City of Albion, thank you for the opportunity to submit these comments on the Proposed Remedial Action Plan for the Albion-Sheridan Township Landfill Superfund Site. Please feel free to contact either of the undersigned directly if you have any questions regarding these comments.

Sincerely,

Scott F. Lockhart, P.E.
Project Manager

Terry R. Baehr
Senior Hydrogeologist

cc: Louis Steinbrecker, City Manager, City of Albion
Leroy Schmidt, Director of Public Water, City of Albion
George Davis, Varnum, Riddering, Schmidt & Howlett
Chuck Robison, Robison & Sims
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